O'Hare Parnagian LLP

20 Vesey Street, Suite 300

New York, NY 10007-2913

Westchester Office
700 White Plains Road, Suite 255
Scarsdale, NY 10583-5013
(914) 725-3632
Fax: (914) 725-3639

> The parties' requests at ECF No. 57 are GRANTED. By separate order, the Court will enter the parties' proposed protective order and amended case management plan.
>
> The Clerk of Court is respectfully directed to close ECF No. 57.
>
> SO ORDERED   5/1/2023
>
> SARAH L. CAVE
> United States Magistrate Judge

By ECF

The Honorable Sarah L. Cave
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1670
New York, NY 10007

> Re: *Jingle Kids USA, LLC v. In Colour Capital, Inc.*,1:22-cv-07089-VSB

Dear Judge Cave:

We write on behalf of all parties and with the consent of Mr. Paul Sigelman, counsel for plaintiffs/counterclaim defendants and third-party defendant.

To facilitate document production, the parties herewith respectfully submit a standard confidentiality stipulation (**Exhibit 1**) and ask that it be so ordered.

Additionally, there are impending deadlines in the January 6, 2023 Amended Case Management Plan and Scheduling Order ("Scheduling Order"), including a May 19, 2023 deadline to complete depositions and a May 31, 2023 deadline to complete fact discovery. The parties have motions pending (including In Colour Capital's motion to dismiss certain claims asserted by Jingle Kids and Mr. Seal, and a motion for leave to amend the complaint submitted by Plaintiffs). The outcome of these motions may change the scope of the pleadings and discovery. There are also certain discovery issues that the parties are attempting to resolve. Given the foregoing, the parties also respectfully request that the remaining deadlines in the Scheduling Order be adjourned by 120 days and that the proposed Second Amended Case Management Plan and Scheduling Order (submitted herewith as **Exhibit 2**) be so ordered to accomplish the same.

Respectfully,

s/Michael Zarocostas

Michael Zarocostas

encls.
cc: Counsel of Record (via ECF)